

EXHIBIT 3

DECLARATION OF RICHARD L. SANTOS

I, Richard L. Santos, hereby declare:

1. I am President and Chief Executive Officer of Church World Service (CWS), one of ten national resettlement agencies. The facts set forth in this declaration are based on my personal knowledge, on my conversations with my staff, and on the information kept in the ordinary course of business at CWS.

2. I make this declaration to set forth the impact on CWS of the State Department's actions since February 25, 2025, when the Court heard argument in our motion for a preliminary injunction and issued a verbal order finding unlawful the State Department's actions to suspend the U.S. Refugee Admissions Program (USRAP).

I. Termination of CWS Cooperative Agreements on February 26, 2025

3. CWS receives funding from the U.S. Department of State through seven "cooperative agreements" with the Bureau of Population, Resettlement and Migration (PRM) (the "cooperative agreements" or "grants"). Five of these cooperative agreements, which have end dates in September 2025, fund CWS' work agreements for the USRAP program. These five cooperative agreements provide CWS with \$98,128,461 in revenue, approximately 35% of CWS's annual revenue. As I described in my previous declaration (ECF No. 15-23 ¶¶ 20, 23), all but one of these agreements are for work performed in the United States to assist refugees and SIVs who have recently resettled.

4. These five cooperative agreements provide for CWS to operate the following programs:

- (i) Provision of Reception and Placement (R&P) services in the United States to refugees and Special Immigrant Visa holders (SIVs) who are not Afghan under a

funding stream called Migration and Refugee Assistance (MRA);

- (ii) Provision of R&P services in the United States specifically to Afghan refugees and SIVs under a program called Emergency Refugee and Migration Assistance (ERMA);
- (iii) Refugee Housing Solutions (RHS), which provides technical assistance for housing for refugees in the United States who are resettled by all ten resettlement agencies;
- (iv) Refugee Welcome Collective (RWC), which provides support for community sponsorship of refugees who are resettled in the United States by all ten resettlement agencies; and
- (v) Administration of Resettlement Support Center (RSC) in Nairobi, Kenya, with suboffices in South Africa, Tanzania, Uganda, and Rwanda (together, RSC-Africa).

5. As described in my previous declaration, refugee admissions and decision-making were suspended on January 20, 2025, and all the funds PRM committed to CWS under these five cooperative agreements were halted through Notices of Suspension that CWS received from PRM on January 24, 2025. (ECF 15-23 ¶¶ 43-44).

6. On the afternoon and evening of Wednesday, February 26, 2025, CWS began receiving a series of email communications stating that PRM was terminating four of the five cooperative agreements for USRAP work.

7. For four of the five cooperative agreements, CWS received a Notice of Termination styled as a letter with “Termination Notification” in the subject line, and another

Notice of Termination with the words “NOTICE OF TERMINATION” in all capital letters near the top of the document (together “Notices of Termination”).

8. The Notices of Termination for four of the five cooperative agreements are annexed to this declaration as Attachment A.

9. The Notices of Termination purport to be effective immediately, and the only reason provided for termination is that the awards “no longer effectuate[] agency priorities.” Attachment A.

II. Devastating and Compounding Impacts of Suspension and Termination

10. PRM’s actions to terminate our cooperative agreements under USRAP compound the devastating impact of the Notices of Suspension that we received on January 24, 2025.

11. First, we have received no funding for any work we expected to do from January 24, 2025 to date, nor for any activity we have done in accordance with the Notices of Suspension, including any payment for work under our cooperative agreement to operate RSC-Africa, which remains under the Notice of Suspension we received on January 24.

12. Second, although we have submitted requests for payment for work done prior to January 24, 2025 for all five cooperative agreements, we have yet to receive any reimbursements. We have responded to all PRM’s questions. However, the grants officer was not able to provide an update on the status of the review process. We received an email from PRM on March 4, 2025 stating: “Thanks for submitting the payment justifications. Unfortunately, I don’t have an update to share on current drawdown requests. CWS payments are still undergoing a review.” That email is annexed to this declaration as Attachment B.

13. The impact of these sudden, no-notice actions on our operations has been crushing. We are currently finalizing decisions for additional layoffs and furloughs if these

Termination Notices are allowed to stand.

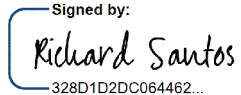
14. In addition, 4,235 clients who have been resettled in the United States and who are eligible for services through our R&P programs have been cut off from funds to assist them with their immediate needs.

III. Conclusion

15. The Termination Notices, like the ongoing Suspension Notices, pose existential threats to CWS's decades-long commitment to refugee resettlement and to the well-being of refugees and others needing humanitarian protection in the United States. Thousands of refugees we serve in the United States face loss of financial and casework support. Hundreds of our staff in the United States and in Africa have been separated from employment, and we expect to have to lay off or furlough many more.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on March 5, 2025

Signed by:

328D1D2DC064462...
Richard L. Santos

Attachment A

(to Richard L. Santos Declaration)



February 26, 2025

To: CHURCH WORLD SERVICE, INC.

Email: [REDACTED]@cwsglobal.org

Subject: Termination Notification of Award No. SPRMCO24CA0319

Reference: state.gov/federal-assistance-policies-appeals/

Dear Partner,

This award is being terminated for the convenience of the U.S. Government pursuant to a directive from U.S. Secretary of State Marco Rubio, for alignment with Agency priorities and national interest. The decision to terminate this individual award is a policy determination vested in the Secretary of State.

Detailed instructions will follow, and a formal modification/amendment to memorialize this action is forthcoming from the Grants Office for specific awards. Kindly confirm receipt of this Termination Notice via electronic email response to the sender.

Sincerely,

Sharon D. James

Sharon D. James
Managing Director
Acquisition Policy Directorate (A/GA/APD)
Department of State



Department of State

Termination Notification

NOTICE OF TERMINATION

February 26, 2025

Church World Service

██████████
110 Maryland Ave NE,
Washington, DC 20002

REF: SPRMCO24CA0319; FY25 CWS Reception and Placement Program OAW/EW

Dear ██████████:

The U.S. Department of State hereby notifies the recipient that this award is immediately terminated as of February 27, 2025. This award no longer effectuates agency priorities and is terminated in accordance with the U.S. Department of State Standard Terms and Conditions, 2 CFR 200.340, and/or Award Provisions as applicable.

Effective immediately upon receipt of this Notice of Termination, the Recipient must stop all work on the program and not incur any new costs after the effective date cited above. Payment requests for legitimate costs incurred prior to this notification are allowable. If your award is already in suspended status, payment requests for legitimate costs incurred prior to the effective date of the Notice of Suspension are allowable. The Recipient must cancel as many outstanding obligations as possible.

Final reports will be due in accordance with the Award Provisions.

Sincerely,

JOSEPH
G KOUBA

Digitally signed by
JOSEPH G KOUBA
Date: 2025.02.26
19:51:57 -05'00'

Joseph Kouba



February 26, 2025

To: CHURCH WORLD SERVICE, INC.

Email: [REDACTED]@cwsglobal.org

Subject: Termination Notification of Award No. SPRMCO24CA0322

Reference: state.gov/federal-assistance-policies-appeals/

Dear Partner,

This award is being terminated for the convenience of the U.S. Government pursuant to a directive from U.S. Secretary of State Marco Rubio, for alignment with Agency priorities and national interest. The decision to terminate this individual award is a policy determination vested in the Secretary of State.

Detailed instructions will follow, and a formal modification/amendment to memorialize this action is forthcoming from the Grants Office for specific awards. Kindly confirm receipt of this Termination Notice via electronic email response to the sender.

Sincerely,

Sharon D. James

Sharon D. James
Managing Director
Acquisition Policy Directorate (A/GA/APD)
Department of State



Department of State

Termination Notification

NOTICE OF TERMINATION

February 26, 2025

Church World Service

██████████
110 Maryland Ave NE,
Washington, DC 20002

REF: SPRMCO24CA0322; FY25 CWS Reception and Placement Program

Dear ██████████:

The U.S. Department of State hereby notifies the recipient that this award is immediately terminated as of February 27, 2025. This award no longer effectuates agency priorities and is terminated in accordance with the U.S. Department of State Standard Terms and Conditions, 2 CFR 200.340, and/or Award Provisions as applicable.

Effective immediately upon receipt of this Notice of Termination, the Recipient must stop all work on the program and not incur any new costs after the effective date cited above. Payment requests for legitimate costs incurred prior to this notification are allowable. If your award is already in suspended status, payment requests for legitimate costs incurred prior to the effective date of the Notice of Suspension are allowable. The Recipient must cancel as many outstanding obligations as possible.

Final reports will be due in accordance with the Award Provisions.

Sincerely,

JOSEPH
G KOUBA

Digitally signed by
JOSEPH G KOUBA
Date: 2025.02.26
19:57:07 -05'00'

Joseph Kouba



February 26, 2025

To: CHURCH WORLD SERVICE, INC.

Email: [REDACTED]@cwsglobal.org

Subject: Termination Notification of Award No. SPRMCO24CA0329

Reference: state.gov/federal-assistance-policies-appeals/

Dear Partner,

This award is being terminated for the convenience of the U.S. Government pursuant to a directive from U.S. Secretary of State Marco Rubio, for alignment with Agency priorities and national interest. The decision to terminate this individual award is a policy determination vested in the Secretary of State.

Detailed instructions will follow, and a formal modification/amendment to memorialize this action is forthcoming from the Grants Office for specific awards. Kindly confirm receipt of this Termination Notice via electronic email response to the sender.

Sincerely,

Sharon D. James

Sharon D. James
Managing Director
Acquisition Policy Directorate (A/GA/APD)
Department of State



Department of State

Termination Notification

NOTICE OF TERMINATION

February 26, 2025

Church World Service

██████████
110 Maryland Ave NE,
Washington, DC 20002

REF: SPRMCO24CA0329; FY 2025 Refugee Housing Solutions

Dear ██████████:

The U.S. Department of State hereby notifies the recipient that this award is immediately terminated as of February 26, 2025. This award no longer effectuates agency priorities and is terminated in accordance with the U.S. Department of State Standard Terms and Conditions, 2 CFR 200.340, and/or Award Provisions as applicable.

Effective immediately upon receipt of this Notice of Termination, the Recipient must stop all work on the program and not incur any new costs after the effective date cited above. Payment requests for legitimate costs incurred prior to this notification are allowable. If your award is already in suspended status, payment requests for legitimate costs incurred prior to the effective date of the Notice of Suspension are allowable. The Recipient must cancel as many outstanding obligations as possible.

Final reports will be due in accordance with the Award Provisions.

Sincerely,

Askar Salikhov
(Affiliate)

Digitally signed by
Askar Salikhov (Affiliate)
Date: 2025.02.26
17:07:07 -05'00'

Askar Salikhov



February 26, 2025

To: CHURCH WORLD SERVICE, INC.

Email: [REDACTED]@cwsglobal.org

Subject: Termination Notification of Award No. SPRMCO24CA0337

Reference: state.gov/federal-assistance-policies-appeals/

Dear Partner,

This award is being terminated for the convenience of the U.S. Government pursuant to a directive from U.S. Secretary of State Marco Rubio, for alignment with Agency priorities and national interest. The decision to terminate this individual award is a policy determination vested in the Secretary of State.

Detailed instructions will follow, and a formal modification/amendment to memorialize this action is forthcoming from the Grants Office for specific awards. Kindly confirm receipt of this Termination Notice via electronic email response to the sender.

Sincerely,

Sharon D. James

Sharon D. James
Managing Director
Acquisition Policy Directorate (A/GA/APD)
Department of State



Department of State

Termination Notification

NOTICE OF TERMINATION

February 26, 2025

Church World Service

██████████
110 Maryland Ave NE,
Washington, DC 20002

REF: SPRMCO24CA0337; FY 2025 Refugee Welcome Collective

Dear ██████████:

The U.S. Department of State hereby notifies the recipient that this award is immediately terminated as of February 26, 2025. This award no longer effectuates agency priorities and is terminated in accordance with the U.S. Department of State Standard Terms and Conditions, 2 CFR 200.340, and/or Award Provisions as applicable.

Effective immediately upon receipt of this Notice of Termination, the Recipient must stop all work on the program and not incur any new costs after the effective date cited above. Payment requests for legitimate costs incurred prior to this notification are allowable. If your award is already in suspended status, payment requests for legitimate costs incurred prior to the effective date of the Notice of Suspension are allowable. The Recipient must cancel as many outstanding obligations as possible.

Final reports will be due in accordance with the Award Provisions.

Sincerely,

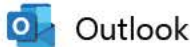
Askar Salikhov
(Affiliate)

Askar Salikhov

Digitally signed by
Askar Salikhov (Affiliate)
Date: 2025.02.26
17:14:49 -05'00'

Attachment B

(to Richard L. Santos Declaration)



Outlook

Re: Drawdown Justifications

From Salikhov, Askar <SalikhovA@state.gov>**Date** Tue 3/4/2025 10:18 AM**To** [REDACTED]@cwsglobal.org>

Hi [REDACTED],

Thanks for submitting the payment justifications. Unfortunately, I don't have an update to share on current drawdown requests. CWS payments are still undergoing a review.

I appreciate you resubmitting the FY25 R&P payment requests. One question I had related to the MRA award. Can you explain the increase in requested National Management funds from the previous request for the same period (1/1/25 - 1/23/25)? You previously requested \$115,484.31, now it's up to \$485,699.12.

Best,
Askar.

From: [REDACTED]@cwsglobal.org>**Sent:** Monday, March 3, 2025 6:38 PM**To:** Salikhov, Askar <SalikhovA@state.gov>**Subject:** Drawdown Justifications

Dear Askar,

Per the directions received, attached please find nine PDF packets and the corresponding Excel files for drawdowns submitted on Friday, February 28, and today, March 3.

Please note that two of the drawdowns submitted today are updated per the instructions received related to February 21, 2025 submissions that were rejected.

Any updates on the previous submissions would be greatly appreciated.

If there are any questions, please reach out any time.

Thank you and have a good evening.

[REDACTED]

[REDACTED]
[Church World Service](#)

[REDACTED]@cwsglobal.org | [REDACTED] | U.S. Eastern Time



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